

UNITED STATES DISTRICT COURT  
FOR NORTHERN DISTRICT OF TEXAS

SOUTHWEST MARINE & GENERAL  
INSURANCE COMPANY, as assignee and  
subrogee of My Community Credit Union,

Plaintiff,  
v.

TAMMION VALENTINE and VALENTINE  
TRAVEL EXPRESS LLC,

Defendants.

No. 3:24-cv-00013-B

**PLAINTIFF'S REQUEST TO DISMISS DEFENDANT, VALENTINE TRAVEL  
EXPRESS LLC WITHOUT PREJUDICE AND FOR DEFAULT JUDGMENT TO BE  
ENTERED AGAINST DEFENDANT, TAMMION VALENTINE**

Plaintiff, Southwest Marine & General Insurance Company, by and through its attorneys, McElroy, Deutsch, Mulvaney & Carpenter, LLP, requests that this Honorable Court (1) dismiss the claims against Defendant, Valentine Travel Express LLC, without prejudice; and (2) enter default judgment in its favor and against Defendant, Tammion Valentine, as set forth in Plaintiff's Motion for Default Judgment (Docket No. 11) which remains pending.

**McELROY, DEUTSCH, MULVANEY &  
CARPENTER, LLP**

Dated: July 3, 2024

By: /s/ Matthew A. Lipman  
Matthew A. Lipman, Esq.  
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*Attorneys for Plaintiff, Southwest Marine &  
General Insurance Company*

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**CERTIFICATE OF SERVICE**

I hereby state that on July 3, 2024, I served a true and correct copy of the foregoing documents on the following via first class mail:

Ms. Tammion Valentine  
12701 Purdue Drive  
Balch Springs, TX 75180

Valentine Travel Express LLC  
c/o Tammion Valentine  
12701 Purdue Drive  
Balch Springs, TX 75180

By: /s/ Matthew A. Lipman  
Matthew A. Lipman, Esquire